

EXHIBIT B



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July 23, 2021

VIA EMAIL

Keker, Van Nest, & Peters LLP
633 Battery Street
San Francisco, CA 94111-1809

RE: Singular Computing LLC v. Google LLC
Case No. 1:19-cv-12551-FDS (D. Mass.)

Counsel,

Singular writes to notify Google that it intends to supplement its infringement contentions in the above captioned case, if necessary, but is unable to do so at this time due to Google's numerous ongoing discovery failures and deficiencies, including but not limited to Google's continued failure to produce highly relevant, critical source code related to the design and operation of the Accused Products in this case. The many issues with Google's discovery responses, source code production, and conduct in this case are discussed in detail in numerous emails and letters from Singular, including Brian Seeve's July 20 and 21, 2021 emails to Google and Mr. Seeve's July 22, 2021 letter to Google. In light of Google's failure to produce all relevant source code, including the specific missing files and code identified in the above noted correspondence, Singular hereby expressly reserves all rights to supplement its infringement contentions once Google finally produces the missing source code it has thus far withheld, after Singular has had a reasonable amount of time to review the same.

Regards,

/s/ Thomas R. Fulford

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